

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

SCOTT AND RHONDA BURNETT, RYAN)
HENDRICKSON, JEROD BREIT, SCOTT)
TRUPIANO, JEREMY KEEL, SHELLEY)
DREYER, HOLLEE ELLIS and FRANCIS)
ARVEY on behalf of themselves and)
all others similarly situated,)
Plaintiffs,)
v.)
THE NATIONAL ASSOCIATION OF)
REALTORS, REALOGY HOLDINGS CORP.,)
HOMESERVICES OF AMERICA, INC., BHH)
AFFILIATES, LLC, HSF AFFILIATES,)
LLC, RE/MAX LLC, and KELLER)
WILLIAMS REALTY, INC.,)
Defendants.)

30(b)(6) HIGHLY CONFIDENTIAL VIDEO DEPOSITION
OF RODNEY GANSO
CHICAGO, ILLINOIS

Wednesday, August 3, 2022, 9:07 a.m.

Job No.: 5320843

HIGHLY CONFIDENTIAL

<p style="text-align: right;">Page 222</p> <p>1 CC'd to some folks including the -- somebody at --</p> <p>2 here at with victoria@remax.</p> <p>3 Do you see that?</p> <p>4 A Yes, I see that.</p> <p>5 Q And it's the subject of the hotel</p> <p>6 confirmation for the NAR RES spring meeting.</p> <p>7 Do you see that?</p> <p>8 A I see that.</p> <p>9 Q And it lays forth the agenda that's going</p> <p>10 to happen when this group of competitors get</p> <p>11 together, this advisory group, April 17th and</p> <p>12 18th, and it lays out the agenda there.</p> <p>13 Do you see that?</p> <p>14 A I don't know if that's an agenda, but I</p> <p>15 see a schedule of activities, yes.</p> <p>16 Q Okay. Okay. And then if we want a list</p> <p>17 of people with their confirmation numbers even,</p> <p>18 heck, we can just jump over here, it's attached to</p> <p>19 that. Actually lists these names again here that</p> <p>20 we went over, and lists if they need a hotel room</p> <p>21 and what their confirmation number is.</p> <p>22 See that?</p> <p>23 A I see that.</p> <p>24 Q And it talks about how these competitors</p> <p>25 are getting together at this NAR function, that</p>	<p style="text-align: right;">Page 224</p> <p>1 MS. MAHONEY: Sorry, Mike, Exhibit 98?</p> <p>2 MR. KETCHMARK: I'm sorry. 980, Stacey,</p> <p>3 I'm sorry.</p> <p>4 THE WITNESS: You can find her title at</p> <p>5 the bottom of the page, Director of Real Estate</p> <p>6 Services --</p> <p>7 BY MR. KETCHMARK:</p> <p>8 Q Thank you.</p> <p>9 A -- Advocacy.</p> <p>10 Q She's a director of real estate services</p> <p>11 at NAR, correct?</p> <p>12 A She was, yes.</p> <p>13 Q She was.</p> <p>14 And when she sent this out, it was going</p> <p>15 to various companies and folks, and the title</p> <p>16 is -- subject is the Top 75 Large Firm Directors,</p> <p>17 and it's an agenda and briefing book.</p> <p>18 Do you see that?</p> <p>19 A I see that.</p> <p>20 Q And we have folks who are listed here.</p> <p>21 Again, we see Mr. Strandmo from HomeServices we.</p> <p>22 See his name there, right?</p> <p>23 A I see that.</p> <p>24 Q We see the CEO of HS Franchises, Mr. Gino</p> <p>25 Blefari on there, right?</p>
<p style="text-align: right;">Page 223</p> <p>1 there's going to be a reception and a dinner, and</p> <p>2 that you'll have members of your executive</p> <p>3 advisory group to join them, these other folks, at</p> <p>4 your reception and your dinner. See that?</p> <p>5 MR. GLASS: Object to form.</p> <p>6 MS. MAHONEY: Objection, form.</p> <p>7 THE WITNESS: I see that.</p> <p>8 BY MR. KETCHMARK:</p> <p>9 Q I mean, this is exactly the kind of event</p> <p>10 that your antitrust policy guys were focused on</p> <p>11 where conspiracy plans can be hatched, right?</p> <p>12 MR. GLASS: Objection to form.</p> <p>13 MS. MAHONEY: Object to form.</p> <p>14 THE WITNESS: I don't know how to answer</p> <p>15 that, Counselor.</p> <p>16 BY MR. KETCHMARK:</p> <p>17 Q I'll leave it to the jury.</p> <p>18 (Exhibit 980 is first referred to.)</p> <p>19 BY MR. KETCHMARK:</p> <p>20 Q Let's turn to Exhibit 980.</p> <p>21 Talking about this -- another e-mail that</p> <p>22 goes out, and I won't go through all of them, but</p> <p>23 you certainly will agree that when this is being</p> <p>24 sent out from a Sarah Young at NAR, do you know</p> <p>25 what Ms. Young's job is?</p>	<p style="text-align: right;">Page 225</p> <p>1 A I see that.</p> <p>2 Q Again, we see John Davis, who we spoke</p> <p>3 about earlier, who was at the RES thing. He's</p> <p>4 listed on there, right?</p> <p>5 MR. RAY: Objection, form.</p> <p>6 BY MR. KETCHMARK:</p> <p>7 Q Keller Williams, do you see that?</p> <p>8 A I see that.</p> <p>9 Q We see John Peyton from Realogy listed on</p> <p>10 there, right?</p> <p>11 A I see that.</p> <p>12 Q We see Mike Ryan from RE/MAX.</p> <p>13 Do you see that?</p> <p>14 A I see that.</p> <p>15 Q We got Bob Goldberg, your chief executive</p> <p>16 officer at NAR, CC'd there, right?</p> <p>17 A I see that.</p> <p>18 Q You got your legal counsel who is on there</p> <p>19 from NAR, correct?</p> <p>20 A Correct.</p> <p>21 Q And it says:</p> <p>22 Dear RES Advisory Group, attached is the</p> <p>23 agenda and briefing book for the Top 75 Large Firm</p> <p>24 Directors Forum next week, NAR's midyear meeting.</p> <p>25 Do you see that?</p>

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